

EXHIBIT A

Form of Proposed Second Amended Scheduling Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (KJC)
) (Jointly Administered)
Reorganized Debtors.)
) Re docket no. 32600, 32619, 32633, 32665, 32687 &
) 32689 & _____

SECOND AMENDED SCHEDULING ORDER RE THIRTY-EIGHTH OMNIBUS
OBJECTION TO CLAIMS FILED BY SGH ENTERPRISES, INC. (SUBSTANTIVE
AND NON-SUBSTANTIVE OBJECTION)

Upon consideration of the *Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)*, dated August 18, 2015 [Docket no. 32600] (the "Objection") and *SGH Enterprises, Inc.'s Response to Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)*, dated October 19, 2015 [Docket no. 32633] (the "SGH Response"), it is hereby ORDERED that the *Scheduling Order re Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)* [Docket no. 32665] (the "Scheduling Order") entered on March 15, 2016, and the *Amended Scheduling Order re Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)* [Docket no. 32689], entered on May 24, 2016, are hereby modified as follows:²

1. On or before June 29, 2016, The Reorganized Debtors and SGH Enterprises, Inc. ("SGH" or "Claimant," together with the Reorganized Debtors, the "Parties"), may file one or

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co. Conn. ("Grace-Conn.").

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Objection or the SGH Response, as the case may be.

more cross-motions for summary judgment (the “Summary Judgment Motions”) as to issues relating to the allowance or disallowance of the SGH Claim that are ripe for summary judgment.

2. The non-moving party shall file a response no later than July 28, 2016.
3. Moving parties shall be entitled to file replies no later than August 12, 2016.
4. Discovery shall be stayed as to all matters until January 11, 2017 (the “Discovery Commencement Date”); *provided, however*, that discovery shall go forward only as to those matters not disposed of by a prior final order of summary judgment.
5. All other dates set forth in the Scheduling Order shall remain unchanged.

Dated: _____, 2016

Honorable Kevin J. Carey
United States Bankruptcy Judge